State Of Ohio Environmental Protection Agency

Southeast District Office 2195 Front Street; Logan, Ohio 43138 -9031

(614) 385 - 8501



Richard F. Celeste, Governor

January 28, 1986

Re: JEFFERSON COUNTY

SATRALLOY/SATRA CONCENTRATIONS

HAZARDOUS MATERIALS

Satra Concentrations, Inc. P.O. Box 536 Steubenville, Ohio 43952

Attention: Mr. Lou A. DiPaolo

EPA Region 5 Records Ctr.



Sir:

On January 9, 1986, representatives of Ohio EPA visited your facility and met with you for a brief site tour. During our visit, you indicated that the current plant process is to recover alloy from low carbon slag by use of a water concentration process. Sludge from this process is being open-dumped on-site, in violation of Ohio Revised Code 3734 and Ohio Administrative Code 3745.

Ohio Administrative Code (OAC) Section 3745-52-11 (attached for your reference) requires generators of waste in Ohio to evaluate their wastes to determine if the wastes are hazardous wastes. Typically, this is done by determining first if the waste is listed as a hazardous waste in OAC Sections 3745-51-30 through -33. If not, the waste should be evaluated for the characteristics listed in OAC Sections 3745-51-21 through 24: ignitability, corrosivity, reactivity, and extraction procedure (E.P.) toxicity. The E. P. Toxicity Test allows a sample to be subject to conditions similar to a landfill would produce, to evaluate the leachable metals underthese conditions, and appears to be the most appropriate test for evaluating your plant's waste. Attached is a list of laboratories which conduct such tests; all sampling for testing must be done in accordance with representative sampling methods described in Appendix I of the Ohio hazardous waste regulations.

Please evaluate the solid wastes presently stored or disposed on your site in accordance with the hazardous waste rules, and submit the sample results to this office within 60 days.

Michael Moschell

Division of Solid & Hazardous Waste Management

MM:dm